CCC & PCC Preliminary draft plan – Comments received and council response/amendments to Supporting Documents
October 2018

Waste Needs Assessment

Ref	Individual / Organisation	Supporting document	Comment	Council response	Proposed amendment
1	Alboro Developments Ltd (Mark Davenport - 1166838)	Waste Needs Assessment (WNA)	General omission point: The Plan, in being entirely insular, makes no recognition of the national need for new EfW infrastructure required to facilitate sustainable waste management. This is evidenced by the fact that England continues to exports large quantities of crudely processed residual waste in the form of RDF (Refuse Derived Fuel). In 2016, the UK exported circa 3.6 million tonnes of RDF to EfW facilities in mainland Europe. On the matter of exporting RDF, Energy from Waste: A Guide to the Debate published by DEFRA states (paragraph 57 extract): "While such exports are permissible, the energy recovered from the waste does not contribute to UK renewable energy targets and is effectively a lost resource to the UK. The Government is keen to support domestic RDF and SRF markets, where they can provide better environmental outcomes, to ensure that the UK benefits from the energy generated from UK waste". By the time this RDF gets to the point of export, there is no clear evidence of its original source, it having been through an intermediate treatment process and typically having travelled a significant distance. The reality is that it is ultimately arises, generally in modest quantities, from a vast array of small waste management facilities spread throughout the country. As such, it is easy for all WPAs to adopt an approach that it is not their problem. In doing so, the RDF export problem continues. The reality is, without WPAs, such as Cambridgeshire / Peterborough, making some acknowledgement of this national problem, it will not be readily solved. It is recommended that the Plan recognises this issue, and that it may contribute to 'Other Recovery' requirements in the Plan area. Para 12 and elsewhere throughout the Waste Needs Document: This para seeks to achieve net waste self-sufficiency. There is no requirement or objective in National waste policy or strategy for Waste Planning Authorities to work towards or deliver net self-sufficiency. In fact, such policy / strategy promotes an approach which is at direct odds with net self-sufficiency at the local level. National Planning Policy for Waste (NPPW) requires planning authorities to: ensure that the planned provision of new capacity and its spatial distribution is based on robust analysis of best available data and information, and an appraisal of options. The assumption that all of Cambridgeshire's / Peterborough's capacity is available for Cambridgeshire's / Peterborough's waste is not robust. As evidenced throughout the Waste Needs Document, Cambridgeshire / Peterborough is a significant net importer of waste. work jointly and collaboratively with	The plan adopts the approach (set out in the NPPW, para 3) of identifying sufficient opportunities to meet the identified needs of the plan area for the management of waste streams (i.e. net self-sufficiency). This need has been identified by identifying the amount of waste requiring management in the plan area over the period of the plan, taking account of wider needs (i.e. part of London's waste) and considering the extent to which the capacity of existing operational facilities (generally taken as permitted capacity) would satisfy any identified need. This approach is compliant with national policy. It should be noted that the proximity principle largely applies to the disposal and recovery of municipal waste, rather than all waste streams and management options. So the cross-boundary movement of C&I and CD&E waste is accepted to occur however in order to align with other sustainability principles, including those for transport, such movements should be kept to a minimum where possible. Such movements will inevitably occur due to operational arrangements, commercial contracts, geographical convenience, etc. however the intent would be to keep these to a minimum where possible. There is	

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			other planning authorities to collect and share data and information on waste arisings. Waste planning authorities should prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. This does not say plan for net self-sufficiency, but to identify the real need, accepting in this case that a significant part of Cambridgeshire's / Peterborough's waste management capacity is / will be used for waste from outside Cambridgeshire / Peterborough, and then plan positively for the needs of the area with this knowledge in mind. Consider the need for additional waste management capacity of more than local significance and reflect any requirement for waste management facilities identified nationally. take into account any need for waste management, including for disposal of the residues from treated wastes, arising in more than one waste planning authority area but where only a limited number of facilities would be required. Energy from Waste: a Guide to the Debate (Defra / DECC Feb 2014) (which sits under the umbrella of the National Waste Strategy – Waste Management Plan for England - 2013), states: The proximity principle arises from Article 16, "Principles of self-sufficiency and proximity", of the revised Waste Framework Directive (2008/98/EC), the EU legislation that governs waste management. The principle is often over-interpreted to mean that all waste has to be managed as close to its source as possible to the exclusion of other considerations, and that local authorities individually need the infrastructure required to do so. This is not the case. Indeed the final part of the Article itself states, "The principles of proximity and self-sufficiency shall not mean that each Member State has to possess the full range of final recovery facilities within that Member State". Clearly if not even the entire country needs to have the full range of facilities, a specific local authority does not have to. While there is an underlying principle of waste being managed close to its source, there is no implication of local authorities needing to be self-sufficient in handling waste from their own area. There is nothing in the legislation or the proximity principle that says accepting waste from another council, city, region or country is a bad thing and indeed in many cases it may be the best economic and environmental solution. The ability to source waste from a range of locations/organisations helps ensure existing capacity is used effectively and efficiently and importantly helps maintain local flexibility to increase recycling without resulting in local overcapacity for residual waste. For an existing plant, taking waste from a range of locations should be seen as a positive by keeping the plant running at maximum efficiency. In many places waste from a number of authorities is processed at the same site very successfully. In short, there is nothing that directly supports an authority adopting net self-sufficiency as a Plan making principle. In fact,	a national trend regarding planning policy for WPAs to adopt the approach of net self-sufficiency and so with more councils supporting development of increased waste management capacity exports to other WPAs (such as those received by CCC and PCC) should decrease over time. The East of England Waste Technical Advisory Body (EoE WTAB) has a Memorandum of Understanding (MoU) in place that recognises that "there will be a degree of cross-boundary movement of waste. In light of this the WPAs will plan on the basis of **net** self-sufficiency which assumes that within each Waste Local Plan area the Planning Authority or Authorities will plan for the management of an amount of waste which is equivalent to the amount arising in that Waste Local Plan area. All the WPAs accept that when using this principle to test policy, it is unlikely to be possible to meet this requirement in full, particularly for hazardous and other specialist waste streams." (EoE WTAB MoU, para 7.1) The plan also does not seek to place a ceiling limit on waste treatment (recovery), however capacity above the identified future needs is likely to require justification / compliance with development principles – including, in due course, compliance with policies in the Minerals And Waste Local Plan once it is adopted. With respect to recovery of inert waste the intent is for this to be	Insert information on the EoE WTAB MoU into the WNA.

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			the above extracts all support a more realistic and robust approach that waste will cross administrative boundaries and thus authorities should plan with this in mind. The Headline Objective should be amended to reflect the inevitable need for cross-boundary movement of waste in the interests of communities and commerce/industry and in order to achieve the economic, social and environmental dimensions of sustainable development. Para 101: The failure to recognise the need to manage the output waste from pre-treatment facilities will undoubtedly result in the forecast for future 'Other Recovery' capacity being underestimated.	directed towards permitted mineral extraction sites to facilitate restoration. Proposals for deposit of inert waste to land at other sites must not prejudice restoration of mineral extraction sites. It should be noted that the principle of net self-sufficiency does not require each WPA to possess the full range of waste management facilities, and the Council accepts this (hence the use of the term "net"). However, in line with the NPPW (para 3, point 3) the plan is required to identify not only waste arisings but the different types of management that would be needed within the plan area over the plan period. This is done to provide guidance to industry and community alike. Para 101. Refer updated WNA "Residual waste arisings" paras 115 to 119. Due to uncertainties that exist in calculating the amount of residual waste arisings as a product of waste treatment processes figures are not included in indicative future needs however estimates of residual waste arisings are included in the WNA. It should be noted that waste process outputs (e.g. 100101, 190503, 190605, 190102, 190210, 190501, 190599, 191212, 191308, etc.) are captured through the Environment Agency Waste Data Interrogator (EA WDI) Residual wastes from processing has been captured as per current management methods through the EA WDI data under the above noted EWC codes, however it	Clarify EWC codes for waste process outputs that are captured through the EA WDI in the WNA.

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				should be noted that EWC 191212 in particular may not necessarily be waste residues from treatment – it can also be waste that has been processed through an intermediate facility or sorted and bulked at a "recycling" facility to then be moved onto another facility for treatment. There is no sure way to determine how much of the waste coded as EWC 191212 is actual residues or that which is under transfers and intended for treatment. Potential residual waste arisings have been calculated to provide a broad guide to possible arisings over the plan period, however the application of such figures is heavily caveated – refer to the WNA for further detail. Residual waste arisings captured through the EA WDI have informed the waste arisings and forecasts however the forecast estimates of residuals has not been added onto the waste arisings forecasts as there is too much uncertainty around these figures, and some of this waste is already captured in the EA WDI data and so may result in overestimates.	
			Paras 103 - 147 This section deals with waste movements (i.e. imports and exports from the Plan area). It recognises that not all waste can be managed within the boundary of the WPA from within it arises. The WNA states that historically (2016), Cambridgeshire and Peterborough imported 1,942,000 tonnes to be managed and exported 514,000 tonnes out of the Plan area. This leaves a net import figure of 1,428,000 tonnes. The NPPW and NPPG specifically require WPAs to take account of waste arising across neighbouring authority areas. Clearly, the reason Cambridgeshire and Peterborough are net importers is because of a number of factors including: its geographical location in respect of major conurbations; historical contractual commitments; the existence of infrastructure to facilitate such development; and because of the special protection given to	Paras 103 – 147. Refer above – also please refer to other WPA adopted Minerals and Waste Local Plans, many of which have adopted such an approach and it has been found to be compliant with national policy and sound. Refer updated WNA "Residual waste arisings" paras 115 to 119, residues have been accounted for however due to uncertainty regarding figures have not been	

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			large areas of land beyond Cambridgeshire and Peterborough (e.g. Green Belt) that means the acceptance of development would cause significant harm to the principles and policies in the NPPF. Notwithstanding these factors, it appears that in adopting the net self-sufficiency approach, the Needs Assessment only carries through Cambridgeshire / Peterborough arisings through to the assessment of new waste capacity requirements, Further, it is not clear that in doing this that the 514,00 tonnes exported out of the Plan area has been reintroduced. We believe that the approach adopted to simply discounting the imported waste is not a realistic or robust approach in determining what the Plan area's actual future waste capacity needs will be.	included in indicative future capacity needs. Note that imports are not simply discounted (refer updated WNA para 34 and 51. Nationally, many WPAs are adopting the approach of net self-sufficiency whilst not precluding cross-boundary movements. There must be a balance struck between allowing movements, diverting waste from disposal to landfill and ensuring that a framework is created in which communities and businesses are engaged with and take more responsibility for their own waste. Hence the intent of net self-sufficiency supports sustainable waste management principles and creates drivers to move waste up the hierarchy (as per national policy). In addition provision is made for London's waste, in line with national policy.	
			Tables 6 and 7: Tables 6 and 7 are still forecasting significant quantities of waste to landfill including (in 2021) circa 262,000 tonnes. A significant portion of this waste should be suitable for energy recovery. Hence, in accordance with the waste hierarchy, forecast 'Other Recovery' figures should be higher. Further, Table 6 illustrates a low annual growth of 1.3% over the first 10-year period (2016 – 2026) and a 0.9% annual growth over the full 20-year period (2016 – 2036). It is not transparent as to how these figures have been derived. The reality is that the initiatives that were developed by the Government to arrest waste growth effectively matured by the end of the first decade of the twenty first century and growth per household across the UK has thereafter started to rise as the economy has grown1. Total waste from households increased in England by 2.5% in 2016 from that in 2015, and then 2.8% in 2017 from 2016.2 On this basis it appears that the forecast waste growth may well have been underestimated.	Tables 6 and 7. These figures reflect targets (refer updated WNA - Table 5, para 96 & 102) – there is no block to going above the targets and further reducing disposal to landfill. Note that the basis for the growth profile for municipal waste is explained in updated WNA para 88; and for Commercial and Industrial Waste, this is explained in the updated WNA at paragraphs 95 to 99.	
			Table 8: Table 8 forecasts no C, D & E waste to 'Other Recovery' by way of thermal treatment with energy recovery. There are elements of this waste stream that have a high calorific value that are best managed as 'Other Recovery' via an EfW. This includes timber and other high calorific	Table 8. Again these figures reflect targets (refer updated WNA para 101) – there is no block to going above the targets and further	Clarify that there is no block to exceeding waste management

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			waste exist which are either inappropriate or uneconomical to recycle. These should be diverted to thermal treatment ('Other Recovery') rather than disposal to landfill. The WRAP Management of Non Aggregate Waste Report (2016) estimates up to 5% of C, D & E waste traditionally taken to landfill could be managed through EfW or other thermal treatment. This is a very significant quantity, for which the Plan makes no appropriate provision. Table 11: NPPW para 3 states that in preparing plans LPAs should: "consider the extent to which the capacity of existing operational facilities would satisfy any identified need". i.e. they should not take regard on unbuilt capacity including that which has planning permission but has not been developed. There are obvious reasons why this is the case. Firstly, many applicants obtain planning permission either in the hope of securing contracts subsequently, or because they simply wish to uplift the value of land without any intention to build out what they have consent for. Secondly, applicants may obtain consent for development of greater capacity than they actually intend to develop in order to safeguard against variation in waste flow or changes in market forces, and the need to have	reducing disposal to landfill. Local data extracted from the EA WDI did not indicate waste recovery via thermal treatment with energy recovery for CD&E. It should be noted that the waste projections (Municipal, C&I, CD&E) need to reflect the current position and build on these to achieve targets. Though such targets can be somewhat aspirational they still need to have some practical basis (i.e. clearly evidenced). Data extracted from EA WDI for 2016 indicates that for inert waste arising from the plan area around 45,000tpa of other waste (i.e. other than EWC 170504) was disposed of to non-hazardous landfill. 5% of non-aggregate CD&E waste (taken to be waste other than EWC170504) would be therefore be around 2,250tpa for the plan area. Wood waste captured through the EA WDI as arising from the plan area is accounted for through other management methods such as preparing for reuse and recycling. The WNA has been updated to take account of the EA WDI 2017 and Defra 2018 waste statistics. Table 11. As noted in updated WNA para 164 the existing capacity was determined by collating information from several existing sources including council planning application and permission records, operator returns and reports, EA WDI dataset, other EA datasets officer estimates where necessary. The WNA has been updated to take account of the EA WDI 2017 and	targets in WNA.

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			to subsequently grapple with the planning system to allow for an increase in capacity. Notwithstanding this clear national policy message, the Needs Assessment capacity calculations appear not only to have assumed that all consented development could be operational to the limit of their consents, but also that all of the waste apportioned to a treatment / recovery facility is fully dealt with and there are no resultant outputs which require further management. As a consequence, we believe the existing capacity identified in the Needs Assessment is significantly overstated when compared to the actual effective existing operating capacity. This error clearly results in the capacity gap being understated. Table 13: Table 13 provides the key conclusions of the Needs Assessment and purports to identify the future waste facility capacity requirements. In so far as 'Other Recovery' (based on energy recovery / thermal treatment) is concerned it identifies 58,000 tonnes of capacity required in 2016 rising to 127,000 tonnes in 2036. Based on foregoing points made within our representations, Table 13 is judged to very significantly underestimate the quantity on 'Other Recovery' thermal treatment capacity that is likely to actually be required in Cambridgeshire and Peterborough over the Plan period. The key reasons for this underestimate can be summarised as follows: A flawed approach has been adopted based on net waste self-sufficiency, that has no support in national policy. This approach ignores the statistical reality (and clear evidence) that very significant quantities of waste are imported into the Plan area and the reasons why this is the case. It under estimates the volumes of waste that could be managed through 'Other Recovery' rather than being disposed of at landfill. At best it is unclear as to the statistical basis on which future waste growth has been determined; and at worst it under estimates likely future waste arisings. It fails to recognise that circa 5% of C, D & E waste sent to landfill is suitable for 'Other Recovery' by way of thermal treatment with energy recovery. It fails to calculate the need to manage the output waste from pre-treatment facilities. Whilst promoting a strategy of net self-sufficiency, it appears to fail to include the 500,000 tonnes of waste exported from the Plan area in calculating the future capacity gap. It significantly over estimates the existing capacity that could manage the identified waste arisings by adopting an approach to calculating existing capacity which is at odds with national policy. It fails to recognise the national need for more energy recovery capacity evidenced by the 3.6 million tonnes of RDF exported from the UK in 2016. It is recommended that the basis of determining the future waste facility capacity requirements as set out in Table 13 is reviewed, in line with the comments made, and updated.	Defra 2018 waste statistic - this update also included identifying the existing waste management capacity based on throughput reported through the EA WDI (and other information where necessary) - refer para 164. This approach is considered to provide a more realistic view of the existing capacity. The existing capacity only captures sites with extant planning permission. Table 13. Please refer to above comments.	

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2	Anglian Water Services Limited (Mr Stewart Patience - 976001)	WNA	Reference is made to the need for additional sewage treatment capacity being identified as part of Water Cycle Studies prepared to support Local Plans in Cambridgeshire and Peterborough. Anglian Water as a sewerage undertaker is responsible for preparing a business plan once every 5 years which includes investment required for growth, water quality and flood risk and resilience at existing Water Recycling Centres. The business plan for the next period 2020 to 2025 known as AMP 7 is expected to be submitted in August 2018. It is anticipated that Ofwat will approve the final business plan in December 2019. Alongside the business plan, the Water Recycling Long Term Plan (WRLTP) is being prepared to provide a more transparent approach to Anglian Water's investment for growth at both WRCs and within the foul sewerage network. The WRLTP is expected to be finalised by summer 2018. The development of the new Minerals and Waste Local Plan should have regard to Anglian Water's business planning process and the WRLTP currently being prepared.	Noted, refer to updated WNA para 78. Refer to Further Draft MWLP, Policy 11 Water Recycling Centres, which seeks to ensure that new water recycling capacity will be facilitated when required.	NA
3	Mick George Ltd (- 168588)	WNA	A concern is that confusing language has been used within the document when describing inert waste and this should be addressed (landfill, beneficial inert fill of quarries, inert recovery and excavation waste). The executive summary acknowledges that the County is a net importer of waste (importing 4 times the amount it exports) and that some movements will still occur in the future but the Plan doesn't appear to allow for this in the future.	Use of terms re inert waste - The terms are used consistently with some used to provide context/describe processes. This is done to assist stakeholders that are not directly connected with the waste industry. Term "excavation waste" is referred to when describing the excavation part of CD&E waste. Term "beneficial deposit of inert waste" is used to describe inert recovery and how this differs from inert landfill (disposal). This approach may also help to address the overlap between permitted sites and those recently permitted/permitted in future as inert recovery. Executive summary - The plan adopts the approach (set out in the NPPW, para 3) of identifying sufficient opportunities to meet the identified needs of the plan area for the management of waste streams (i.e. net self-sufficiency). This need has been identified by identifying the amount of waste requiring	

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				management in the plan area over the period of the plan, taking account of wider needs (i.e. part of London's waste). This approach is compliant with national policy. Whilst cross-boundary movements are accepted to occur such movements should be kept to a minimum where possible in order to align with sustainability principles, including those for transport. Such movements will inevitably occur due to operational arrangements, commercial contracts, geographical convenience, etc. however the intent would be to keep these to a minimum where possible. There is a national trend regarding planning policy for WPAs to adopt the approach of net self-sufficiency and so with more councils supporting development of increased waste management capacity exports to other WPAs (such as those received by CCC and PCC) should decrease over time. With respect to recovery of inert waste the intent is for this to be directed towards permitted mineral extraction sites to facilitate restoration. Proposals for deposit of inert waste to land at other sites must not prejudice restoration of mineral extraction sites.	
			Paragraph 33 - Accepts that the EA WDI database may contain errors and the WNA should build flexibility into the figures subsequently used.	Para 33 – The best available data was used in preparing the WNA. The WNA has been updated to take account of the EA WDI 2017 and Defra 2018 waste statistics. Sensitivity testing has been incorporated where appropriate. Data used and method applied is	

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				referenced/set out through the WNA. WNA identifies estimates of waste arisings, projections and management needs – this is reflected through use of terms estimate, indicative, etc. The inclusion of a "buffer" percentage to build in flexibility would not be based on any firm evidence and so has not been applied. The policy contained within the MWLP will address flexibility within the plan, in addition the plan will include a monitoring framework.	
			Paragraph 42 - States WDI 2016 of CD&E arisings of 1.5 million tonnes.	Para 42 – Noted. The WNA has been updated to take account of the EA WDI 2017 and Defra 2018 waste statistics.	
			Paragraph 43-Suggests that using dwelling completions as an indicator against national waste figures the County processes 1.3 million tonnes although the table referred to for their calculations is from the Defra 2016 UK statistics on waste (Table 3.1 of the Defra document) which states that it 'excludes excavation waste'. Clarification is required to confirm if this has been taken into account or not.	Para 43 – As stated in para 43 (WNA May 2018) these figures were used for sensitivity testing – i.e. comparison with other available datasets and to see if the plan was in the right ball park. The WNA has been updated to take account of the EA WDI 2017 and Defra 2018 waste statistics.	
			Paragraph 48 - Table 3 states that of the CD&E waste, 492,000 tonnes was disposed of to landfill in 2016. MGL waste returns indicate that the Company alone disposed of 551,000 tonnes in the same period arising from Cambridgeshire and Peterborough and this figure doesn't include additional landfilled waste from other operators in the plan area. This discrepancy may be down to the use 'Inert Recovery (beneficial deposit of inert waste to land)' which should only be used where that material has been placed under a recovery permit. The MGL figures quoted are disposal not recovery.	Para 48 – The figure referred to in Table 3 (WNA May 2018) of 0.492Mt of inert waste to disposal includes both inert landfill and non-hazardous landfill, this table presents a summary but this can be clarified/separated out. Note that the "Environment Permitting Regulations 2010 Regulatory guidance (EPR13) – Defining waste recovery: Permanent deposit of waste in land" allowed for the deposit of inert waste to land to be classified as recovery. The Methley Quarry judgement (November	Para 48 – Clarify that: (i) the figure in Table 3 includes inert and non-hazardous landfill; and (ii) how inert recovery and landfill/disposal have been taken into account regarding recent amendments to Environmental Permitting regulatory guidance.

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				2015) has seen the test for whether a scheme can be classified as disposal or recovery changed. This means that some sites permitted as “inert landfill/disposal” would likely be “inert recovery” as they are directly associated with the restoration of permitted mineral extraction sites, whilst others permitted as “inert recovery” would likely not pass the tests and would be “inert landfill”. As such the WNA seeks to reconcile this in order to provide a view of what would currently be viewed as recovery (informed by the MPAs planning and development control officers) and what “inert recovery” may look like over the plan period. The WNA will be amended to clarify this point.	
			Paragraph 88 -Acknowledges a 'conservative approach' for estimation of CD&E arisings.	Para 88 – Noted. Conservative approach for CD&E waste is supported by the NPPG (Waste, Para 033 Ref ID 28-033-20141016).	
			Paragraph 92 - Table 8 shows an allowance of approximately 192,000 tonnes per annum for inert landfill for the next 20 year period. (a) This includes a figure for 2016 which contradicts Table 3 as noted above losing 300,000 tonnes of inert landfill which was already underestimated. (b) The total annual allowance is less than the difference noted between paragraph 42 and 43 which was deemed to be 'broadly comparable' . In conjunction with (a) it therefore doesn't seem appropriate to use this figure.	Para 92 – (a) Refer Council comments regarding response to para 48 above. (b) The two figures (i.e. the identified inert disposal rates and difference between figures in para 42 & 43 WNA May 2018) are not comparable as one is a breakdown of management rates and the other is the difference between national datasets used for the purpose of sensitivity testing. It should be noted that the WNA has been updated to take account of the EA WDI 2017 and Defra 2018 waste statistics.	
			Paragraph 111, 7th bullet point - Confuses landfill and 'beneficial inert fill of quarries' again.	Para 111 – there is no confusion between terms here – refer to note	

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				in brackets (WNA May 2018) that clearly state that a large proportion of which could be considered as beneficial inert fill of quarries. This may under the updated EPR guidance tests constitute inert recovery and not inert landfill/disposal.	
			Paragraph 113 - Quotes main inert sites receiving inert waste in the area as Barrington and Witcham Meadlands in 2016. In fact, MGL's Kennett Hall Quarry site which is not on the list received 184,000 tonnes in 2016	Para 113 – EA WDI figures reported are inert waste received as imports from other WPAs for disposal to inert and non-hazardous landfill (not total received to site).	
			Paragraph 150, Table 11 'Disposal' - Combined 'inert landfill/ landfill beneficial restoration' figure is 335,000 tonnes contradicting the Table 3 figure of 492,000 tonnes - terminology needs to be consistent; inert recovery is quoted in this table for the first time but the total figure (294,000 tonnes) is more than the 157,000 tonnes discrepancy noted for the landfill figures.	Para 150, Table 11 – Refer Council comments regarding response to para 48 above.	
			Paragraph 150, Table 12 - No hazardous landfill void noted in 2016. The MGL Witcham Meadlands site is omitted. Paragraph 152 - No hazardous landfill void noted again.	Para 150 and 152 – SNHRW is included in non-hazardous waste – refer Table 11 WNA May 2018.	Where possible include estimate of SNRHW void space, refer updated WNA Tables .1,2,3,6,7,8 and para 29.
			Table 14- Inert recovery and inert landfill figures combined is 932,000 tonnes for 2016. The combined arisings in Table 3 equate to 1,173,000 tonnes; an apparent 241,000 tonnes discrepancy between the 'actual' arisings and future needs at year zero.	Table 14 – Refer Council comments regarding response to para 48 above.	
			Paragraph 162 - Confuses that landfill / recovery terminology again stating 15.4 million tonnes of landfill void and 0.657 million tonnes of recovery void being available at the start of the plan period where previously, recovery void in Table 3 and Table 14 has been quoted as being more than landfill void. The paragraph goes onto state that 'no new inert landfill or recovery sites (not associated with mineral extraction sites) are required'. This statement may prejudice future recovery applications and contradicts the principle that a recovery operation provides an ecological benefit and /or fulfils a planning condition using waste instead of a primary material (subject to conditions being met) i.e . these are not limited to mineral extraction.	Para 162 – Refer Council comments regarding response to para 48 above, also see note under WNA table 14 (WNA May 2018). It is for the plan policies to set out more detail regarding development principles for inert recovery and disposal.	
			Table A1.2 (p . 53) - Some inert sites also appear in the non-hazardous sites listed. Assurance should be given that the remaining voidspace	Table A1.2 (pg. 53) – Where available information from	Table A1.2 (pg. 53) – Clarify where inert

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			hasn't been counted twice. Table Al.3 (p.54) -While the permissions maybe extant for these sites, it is felt some of them do not have remaining non-hazardous void space (Warboys and Dogsthorpe in particular). For this and the point above, we would suggest that the tables state the assumed remaining void available at the site to allow for greater transparency I scrutiny of the figures being used. Table Al.4 (p.54) -Witcham Mead lands facility omitted. As a general comment, we consider that the allowance of net self-sufficiency across the WPAs (para 103) to balance cross boundary waste movements into plan area is optimistic in an area that imports four times the amount of waste that it exports, especially given our proximity to the London Market and the fact that excavation and hazardous waste reduction targets are not set out in the London Plan. Finally, a reasonable amount of material is classified under the CL:AIRE protocol. This is determined by classification of the material at source and if not applicable then the material would be classified as inert waste. The volume of material handled under this protocol should be investigated as part of the MWLP review.	operators and planning officers was used to separate the inert (i.e. used for engineering purposes) and non-hazardous (waste for disposal) components. Table A1.3 (pg. 54) – The Council cannot report individual sites remaining voidspace for reasons of commercial confidentiality, as such figures are aggregated (reported as a whole). Table A1.4 (pg. 54) - Refer Council comments regarding response to para 150 and 152 above. Refer to previous Council comments on this matter above (executive summary). CL:AIRE protocol – Data on waste classified under the CL:AIRE protocol is not available to the WPA. There is no requirement to assess the volume of material handled under this protocol for Local Plans.	and non-hazardous components are identified separately in Appendix 1 Table A1.2 . Identify sites providing SNRHW capacity in Appendix 1
4	AmeyCespa (East) Limited (Amey) (- 1169574)	WNA	The WNA sets out the National and European Policy relevant to Minerals and Waste plan making. The WNA rightly focuses attention on compliance with the objectives of the National Planning Policy for Waste (NPPW) as the Government's national waste policy. How the WNA accords, or not, with the objectives of the NPPW is set out below. NPPW on Self-sufficiency and Proximity The NPPW states that planning plays a role in: "Providing a framework in which communities and businesses...take more responsibility for their own waste...in the case of mixed municipal waste from households, recovered, in line with the proximity principle." The principles of self-sufficiency and proximity are set out in The Waste (England and Wales) Regulations 2011 (WEWR). It seeks to; "Establish an integrated and adequate network of waste disposal installations and of installations for the recovery of mixed municipal waste collected from private households. The network must be designed to enable the European Union as a whole to become self-sufficient in waste disposal and in the recovery of mixed municipal waste collected from private	The plan adopts the approach (set out in the NPPW, para 3) of identifying sufficient opportunities to meet the identified needs of the plan area for the management of waste streams (i.e. net self-sufficiency). This need has been identified by identifying the amount of waste requiring management in the plan area over the period of the plan, taking account of wider needs (i.e. part of London's waste) and considering the extent to which the capacity of existing operational facilities (generally taken as permitted capacity) would satisfy	NA

Ref	Individual / Organisation	Supporting document	Comment	Council response	Proposed amendment
			households...The network must enable waste to be disposed of and mixed municipal waste collected from private households to be recovered in one of the nearest appropriate installations, by means of the most appropriate technologies...” Importantly, the proximity principle requires the EU to become self-sufficient and for authorities to ensure that a network of facilities is made available to manage mixed municipal waste at one of the nearest appropriate installations. It does not expect each and every local authority to deal solely with its own waste to meet the requirements of self-sufficiency and the proximity principle1. Nor does the proximity principle require using the absolute closest facility to the exclusion of all other considerations. Authorities should not ‘close their doors’ to waste from other authorities or businesses from beyond its boundary as it is unsustainable, economically and environmentally damaging and contrary to national policy. There are significant economies of scale for authorities working together to assist with the development of a network of facilities to enable waste to be handled effectively. The ability to source waste from a range of locations helps ensure existing capacity is used effectively and efficiently, and maintains local flexibility to increase the ability to drive waste up the waste hierarchy. Against this background, the WNA has been developed with the principal objective of developing a strategy based on a need that solely considers waste generated from within Cambridgeshire and Peterborough and then historically managed within Cambridgeshire and Peterborough. This is dangerous and short-sighted given that the Plan area continues to be a net importer of waste (see commentary below), and that National Waste Policy is predicated by a fundamental objective of driving waste up the waste hierarchy. By ignoring waste imports and relying on facilities to come forward in less sustainable locations without the support of a robust plan, it results in clear conflict with National Policy. It has the potential to have broad reaching consequences within the Plan area and beyond. NPPW on using a proportionate evidence base The NPPW states that, in preparing their local plans, authorities should; “ensure planned provision of new capacity and its spatial distribution is based on robust analysis...Spurious precision should be avoided...work jointly and collaboratively with other planning authorities to collect and share data, and take account of waste arising across neighbouring waste planning authorities.” In identifying a need for waste management facilities, the NPPW states that; “Waste planning authorities should prepare Local Plans which identify sufficient opportunities to meet the identified needs for their area for the management of waste streams...drive waste management up the waste hierarchy...consider the need for additional waste management capacity of more than local significance and reflect any requirement for waste management facilities	any identified need. This approach is compliant with national policy. The proximity principle largely applies to the disposal and recovery of municipal waste, rather than all waste streams and management options. So the cross-boundary movement of C&I and CD&E waste is accepted to occur however in order to align with other sustainability principles, including those for transport, such movements should be kept to a minimum where possible. Such movements will inevitably occur due to operational arrangements, commercial contracts, geographical convenience, etc. however the intent would be to keep these to a minimum where possible. There is a national trend regarding planning policy for WPAs to adopt the approach of net self-sufficiency and so with more councils supporting development of increased waste management capacity exports to other WPAs (such as those received by CCC and PCC) should decrease over time. As noted above (Rep.1) the EoE WTAB MoU agrees that WPAs within the EoE lanon the basis of **net** self-sufficiency. The plan also does not seek to place a ceiling limit on waste treatment (recovery), however capacity above the identified future needs is likely to require justification / compliance with development principles – including, in due course, compliance with policies in the Minerals And Waste	

Ref	Individual / Organisation	Supporting document	Comment	Council response	Proposed amendment
			identified nationally...take into account need for waste management, including for disposal of the residue from treated waste...work collaboratively to provide a suitable network of facilities to deliver sustainable waste management." Identification of sites. We commend the fact that the WNA acknowledges Local Plans should recognise the role of catchment areas in securing economic viability. This represents an appreciation of the fact that waste forecasting is not an exact science and that multi-million-pound waste infrastructure can only be delivered with the flexibility necessary to guarantee funding. The WNA	Local Plan once it is adopted. With respect to recovery of inert waste the intent is for this to be directed towards permitted mineral extraction sites to facilitate restoration. Proposals for deposit of inert waste to land at other sites must not prejudice restoration of mineral extraction sites. It should be noted that the principle of net self-sufficiency does not require each WPA to possess the full range of waste management facilities, and the Council accepts this (hence the use of the term "net"). However, in line with the NPPW (para 3, point 3) the plan is required to identify not only waste arisings but the different types of management that would be needed within the plan area over the plan period. This is done to provide guidance to industry and community alike. It should also be noted that the role of the WNA is not to develop strategy but to provide evidence regarding the current situation with respect to waste management and disposal within the plan area (collating existing data and information), identify the policy context and develop projections to inform the plan-making process that align with requirements set out through the policy context and reflect local circumstances. Identification of sites. As noted in updated WNA para 164 the existing capacity was determined by collating information from several existing sources including council planning application and permission	

Ref	Individual / Organisation	Supporting document	Comment	Council response	Proposed amendment
			rightly recognises that opportunities should be considered for on-site waste management along with co-locating waste management facilities together with complementary activities. Again, this is accordance with the objectives and policy set out within NPPW. Identification of need The WNA references the fact that National Planning Policy Guidance (NPPG) on Waste sets out guidance to Waste Planning Authorities (WPA) as to how they should identify a need for new facilities2. The NPPG states that WPAs should understand waste arisings from within the authority area, including imports and exports (in recognition of the requirement in national policy to take account of waste arisings across neighbouring authority areas, working collaboratively with other authorities and enabling facilities to be delivered so as to manage waste at one of the nearest appropriate installations). It also recognises that the capacity of waste management facilities may change depending on a wide range of factors, including market conditions. Accordingly, WPA should not assume that all facilities with permission will be developed, and where they are developed, they should not assume that they will run at capacity. The NPPG requires WPAs to ensure they have obtained sufficient details on existing waste management facilities to enable them to plan effectively and that this should be transparent. In the case of the WNA, capacity appears to have been determined by collating information from a number of sources, albeit it is impossible to corroborate this against the Appendix 1 list of sites with extant permission. It appears that the existing capacity of sites has been derived principally by reviewing planning application and permission records, applying planning permission end dates where no alternative information is available, and assuming any permitted capacity will be fully exhausted. This is discussed further below. The reality is that, for a number of reasons, many sites with planning permission are not developed, and those that are rarely reach consented capacity due to operational limitations. The simple existence of consented capacity does not negate the need for additional facilities and places significant risk on the possibility of an under-supply of waste management capacity forcing waste to landfill which could otherwise be managed further up the hierarchy. The WNA appears to provide a reasoned basis on which Local Authority Collected Waste (LACW), Commercial and Industrial (C&I) waste and Construction, Demolition and Excavation (C, D&E) waste generated within Cambridgeshire and Peterborough in 2016 has been calculated. It states that a number of recognised techniques have been applied, and whilst the sources used appear logical, the evidence base, and the resultant statistics to inform the baseline have not been made available for review, leaving the reader having to rely on the fact that the numbers are indeed	records, operator returns and reports, EA WDI dataset, other EA datasets officer estimates where necessary. The WNA has been updated to take account of the EA WDI 2017 and Defra 2018 waste statistic - this update also included identifying the existing waste management capacity based on throughput reported through the EA WDI (and other information where necessary) - refer updated WNA para 164. The existing capacity captures sites with extant planning permission. The methodology and datasets utilised in undertaking the assessment are clearly identified in the WNA. All key information is stated with sources provided as such the data can be queried. WPAs regularly query such data (responding to other WPA	

Ref	Individual / Organisation	Supporting document	Comment	Council response	Proposed amendment
			robust. The current (2016) quantity of LACW and C&I cumulatively shown to landfill generated within Cambridgeshire and Peterborough (Table 1 and 2) equates to 305,000 tonnes. Table 4.4. of the AmeyCespa Waterbeach Waste Management Facility (WWMF) Planning Statement (Need) identifies a total of 216,353 tonnes to landfill in Cambridgeshire and Peterborough from within Cambridgeshire and Peterborough. In reality, the discrepancy could be greater given that elements of C, D&E to landfill may be 'suitable' for management at EfW. However, the difference is assumed to equate to the fact that the WWMF Need is predicated solely on considering waste 'suitable' for management at EfW using waste codes on reference permit applications across the UK (i.e. there will be elements of the waste to landfill identified in Tables 1 and 2 which will not be suitable for EfW or similar). Growth Profiles In terms of LACW, the WNA forecasts a growth profile derived from population projections and waste generation. Table 6 illustrates a low annual growth of 1.3% over the first 10-year period (2016 – 2026) and a 0.9% annual growth over the full 20-year period (2016 – 2036). It is unclear from the WNA as to how these figures have been derived. Paragraph 73 states that, in respect of municipal waste arisings, the growth profile has been derived from population projects and waste generation per person per annum broadly in accordance with the NPPG. In terms of C&I waste, paragraph 80 states that growth profiles have been derived based on total Gross Value Added (GVA) and Individual business sector GVA annual increase. This results in an annual increase in the 2016-2026 period of circa 2% and an annual increase of circa 2.2% over 20 years (2016-2036). It is not clear how or why the NWA has applied these growth factors. The NPPG requires a staged process to be adopted whereby different growth scenarios (ranges) are applied. In this instance it appears that the WNA has not applied this approach. Across the UK, following a relatively gradual decline in annual growth of waste per household between 2005 and 2010; rates thereafter remained relatively static. This is not overly unexpected given the fiscal mechanisms employed by Central Government (The Waste Infrastructure Delivery Programme, Landfill Allowance Trading Scheme, Landfill Tax Escalator etc.); and the educational initiatives Local Government has put in place	emerging plans, planning applications, etc.) by accessing the identified data sources, which are publically available. The WNA has been updated to take account of the EA WDI 2017 and Defra 2018 waste statistics. AmeyCespa Waterbeach Waste Management Facility Planning Statement, Section 4.0 Need for the Development, Table 4.4. The reason for the discrepancy cannot be identified based on the information available but it is likely that it relates to waste codes included in figures in Table 4.4 whereas those in the WNA Table 1&2 capture waste to landfill as estimated through the WDI/national datasets. Growth profiles. As stated above all data and information sources are noted in the WNA – individual datasets can be downloaded and annual increases analysed. The WNA provides a summary of the estimate of arisings and forecasts and sets out all assumptions reference datasets/documents utilised. Should individuals or organisations wish to query the primary data sources or use the data for their own analysis they are able to do so. Planned growth rates have been accounted for through the WNA. The growth profiles are based on the best available and up to date information and take account of local circumstance (e.g. planned growth, population projections and economic forecasts).	

Ref	Individual / Organisation	Supporting document	Comment	Council response	Proposed amendment
			during the first decade of this Century to decouple waste generation from economic growth and drive waste management up the waste hierarchy. In more recent years (2015-2017) total waste from households started to increase. The initiatives that were developed by Government effectively matured by the end of the first decade of the twenty first century and growth per household across the UK has thereafter started to rise as the economy has grown3. Total waste from households increased in England by 2.5% in 2016 from that in 2015, and then 2.8% in 2017 from 20164. Locally, Cambridgeshire and Peterborough have been identified in the Government's Sustainable Communities growth agenda. It is known that significant growth will take place over the plan period, evidenced by the findings of the Cambridgeshire and Peterborough Authorities Statutory Governance Review in June 2016 which recognised that the annual Gross Value Added (GVA) for the area is over £22bn and that the area is the fastest growing in the country. This is supported by the current emerging local plans within Cambridgeshire which collectively seek to deliver a further 75,000 new homes over the next 10-15 years each of which will generate waste which needs to be sustainable managed. As a result, it is reasonable expect as part of intelligent plan making, to apply a growth of waste arisings in Cambridgeshire and Peterborough to be in excess of that experienced recently in the UK of 2.8% annually. Instead, the WNA has applied growth factors of around 1% for LACW and 2% for C&I waste. This results in an inevitable underplay of the waste from within Cambridgeshire and Peterborough that requires managing over the Plan period. The risks associated with such a strategy is that the plan will fail to allocate sufficient residual waste treatment capacity meaning that waste will either not be managed at the nearest appropriate installation or will not be managed as high up the waste hierarchy as possible (e.g. waste which could be recovered would be sent to landfill because there is no appropriate facility planned for). Waste Management Table 6 (and with respect to C&I, Table 7) apply reasonable target apportionment of the anticipated waste arisings. In 2016 municipal waste is apportioned at 50% preparing for reuse and recycling (recycling and composting); 20% other recovery; and 30% disposal to landfill. By 2036 the WNA anticipates 55% preparing for reuse and recycling; 35% other recovery; and 10% disposal to landfill. In terms of C&I, the 2016 split is 52% preparing for reuse and recycling; 22% other recovery and 23% to landfill. By 2036, 53% is preparing for reuse and recycling; 34% recovery; and 12% to landfill. Accordingly, and in both cases, the primary drive is to divert significant volumes of waste from landfill to other recovery. This is very much in accordance with the waste targets identified in the WNA and	The plan will include a monitoring framework to allow for projections and actuals (where available) to be compared with corrective measures taken where necessary. Appendix 3 includes a reference list. Tables 6 (municipal) and 7 (C&I). These figures reflect targets – there is no block to going above the targets and further reducing disposal to landfill. Note that the basis for the growth profile for municipal waste is explained in updated WNA para 89. Table 8 (CD&E). Again these figures reflect targets – there is no	

Ref	Individual / Organisation	Supporting document	Comment	Council response	Proposed amendment
			within national policy. However, this still represents significant volumes of waste to landfill. Using the WNA figures, in 2016 the volume of LACW and C&I waste to landfill equates to 306,000 tonnes. By 2026 this has reduced to 210,000 tonnes. By 2036 this is down to 177,000 tonnes. C, D & E waste arises from the construction or demolition of buildings and/or civil engineering infrastructure. The Waste Management Plan for England (December 2013) confirms that the C, D & E sector is the largest contributing sector to the total waste generation. The WNA Table 13 (summary of arisings and future needs) identifies inert recycling (C, D & E) and soil treatment (C, D & E) with all other elements of the C, D & E waste stream managed through disposal in Table 14. Whilst by its very nature the vast majority of C, D & E waste is either recycled as secondary aggregate or disposed of to landfill, it is wrong to assume that there are not elements of this stream that has a high calorific value that cannot be managed as 'Other Recovery' via an EfW. It is inevitable that clean timber and other high calorific waste exist in the C, D and E waste stream which are either inappropriate or uneconomical to recycle. These can be diverted to thermal treatment ('other recovery') rather than disposal to landfill. It is particularly important that sufficient capacity exists to manage C, D & E waste up the waste hierarchy, not only because it is such a significant percentage of the overall volume of waste created, but also because it is the highest volume of waste found at illegal sites5. Whilst it is very difficult to predict the precise percentage of C, D & E waste that could be managed through EfW or other thermal treatment (the WRAP Management of Non Aggregate Waste Report 20166 estimates up to 5% of that traditionally taken to landfill), it is dangerous to simply remove this stream entirely from the calculations of capacity requirement for management of non-hazardous wastes on the assumption that any of this waste which is not recycled would divert to landfill. When including 5% of the landfilled C, D&E waste (i.e. the proportion that could reasonably be driven up the waste hierarchy to be managed through thermal treatment), the figures to landfill of which the vast majority could reasonably be diverted to recovery, would equate to 330,600 tonnes in 2016, 234,000 tonnes in 2024 and 200,850 in 2036. Imports and Exports The WNA recognises that not all waste can be managed within the boundary of the WPA from within it arises. The WNA states that historically (2016), Cambridgeshire and Peterborough imported 1,942,000 tonnes to be managed and exported 514,000 tonnes out of the Plan area. This leaves a net import figure of 1,428,000 tonnes. The NPPW and NPPG specifically require WPAs to take account of waste arising across neighbouring authority areas. Whilst local self-sufficiency is an admirable	block to going above the targets and further reducing disposal to landfill. Local data extracted from the EA WDI did not indicate waste recovery via thermal treatment with energy recovery for this waste stream The waste projections need to reflect the current position and build on these to achieve targets. Though such targets can be somewhat aspirational they still need to have some practical basis (i.e. clearly evidenced). Various scenarios were applied for waste streams regarding identification of arisings and growth profiles, as set out in the WNA. Data extracted from EA WDI for 2016 indicates that for inert waste arising from the plan area around 45,000tpa of other waste (i.e. other than EWC 170504) was disposed of to non-hazardous landfill. 5% of non-aggregate CD&E waste (taken to be waste other than EWC170504) would therefore be around 2,250tpa for the plan area. Wood waste captured through the EA WDI as arising from the plan area is accounted for through other management methods such as preparing for reuse and recycling. The WNA has been updated to take account of the EA WDI 2017 and Defra 2018 waste statistics. Imports and exports. The intent is for NET self-sufficiency - refer Rep.1 above regarding imports, movements and net self-sufficiency. Total arisings are derived from taking account of datasets and information as outlined in the WNA	

Ref	Individual / Organisation	Supporting document	Comment	Council response	Proposed amendment
			aspiration, the reason Cambridgeshire and Peterborough are net importers is because of a number of factors including; its geographical location in respect of major conurbations; historical contractual commitments; the existence of infrastructure to facilitate such development; and because of the special protection given to large areas of land beyond Cambridgeshire and Peterborough (e.g. Green Belt) that means the acceptance of development would cause significant harm to the principles and policies in the NPPF. If the Councils are proposing a strategy based solely on an aspiration of self-sufficiency and managing solely the waste generated from within the Plan area, account must be had within the baseline figure and resultant forecasts to the circa 500,000 tonnes of waste exported out of the County. It is unclear from the information provided whether that is indeed the case, however with reference to Paragraph 147 (that appears to have been used to determine forecast arisings) the baseline applied solely relates to waste originating from and being received at facilities in Cambridgeshire and Peterborough. This is a significant flaw in the future determination of capacity gap. The WNA turns its back on its neighbouring authorities in developing its future need requirements. The forecast arisings used have no regard to the historical movement of waste, the requirements and objectives of national policy or that fact that administrative boundary restrictions make investment in infrastructure unviable and undeliverable. The WNA references the existence of historical movement into and out of the County, and with regard to London applies a reduced amount annually to Cambridgeshire and Peterborough in line with the Greater London Plan, culminating in no import from London by 2026. Based upon an assessment of historical management of residual non-hazardous waste combined with projected growth rates, and the Greater London Plan objective of achieving self-sufficiency in London, it is understandable that the WNA has chosen to support a proposal of reducing provision for managing London's waste. The proximity principle requires that the UK waste management network enables waste to be disposed of, or recovered, in one of the nearest appropriate installations irrespective of administrative or authority boundaries. It is inevitable that facilities will be located beyond administrative boundaries, but still represent one of the nearest appropriate installations for the management of waste from that authority. That is the case throughout the UK. The Greater London Plan acknowledges the need for new capacity for non-hazardous waste to go to landfill or EfW from London to Counties within the South East and East of England. Despite carbon emissions falling, London continues to struggle to maintain its momentum and enthusiasm for recycling of LACW and C&I waste. It is estimated that the lack of recycling and recovery facilities within London to manage their waste	and include waste arisings and managed within the plan area, plus waste arisings and exported from the plan area to other WPAs (updated WNA refer paras 34 and 51).	

Ref	Individual / Organisation	Supporting document	Comment	Council response	Proposed amendment
			needs will continue to grow with a shortfall of over 4 million tonnes in 2016, forecasted to increase to 8 million tonnes by 20307. It is extremely short sighted to assume simply that, because the Greater London Plan seeks to support proposals that manage waste derived from within their respective authority areas, that this will inevitably happen and thus provision need not be provided. In order to ensure that the predicted shortfall of waste from London is managed in accordance with the Waste Management Plan for England and the Waste Framework Directive continued allowance for a proportion of exported London Waste to Cambridgeshire and Peterborough be provided for. The same principles apply to other waste authorities outside London and beyond the Plan area. The future need calculations have been produced on the sole assumption of the Plan area arisings, and the existing capacity has been entirely consumed by these arisings. In reality, the existing capacity will be consumed considerably quicker than anticipated, in part due to a likely underestimation of waste growth and part due to a failure to accept an overall net-import of waste. The result is likely to be either an inevitable need for additional recovery facilities but no appropriate plan in place to deliver them, or waste going to landfill which could be managed further up the waste hierarchy. In accordance with the NPPG, the WNA has been informed by a survey of relevant Waste Planning Authorities (WPAs) to confirm the general scale and type of cross-boundary movements. We recognise that the WPAs have advised that existing landfill capacity should be safeguarded with regards to landfill diversion targets and planning new infrastructure higher up the waste hierarchy so that landfill sites are only used for specialist waste and non-recoverable and non-recyclable wastes and non-recyclable wastes. This is set against a wider strategy to limit the release of additional landfill sites, placing further pressure on existing landfill capacity. Cambridgeshire and Peterborough agrees with this approach in that it accords with national policy and waste planning guidance. We support this strategy. The WNA (para 147) concludes that, with respect to the baseline year of 2016, and having accounted for waste attributed to intermediate facilities, 2,609,000 tonnes of waste was received to management and disposal facilities in Cambridgeshire and Peterborough, originating from within Cambridgeshire and Peterborough. Of that, 263,000t was processed through preparing for reuse and recycling facilities (e.g. MRF) and 564,000t was sent to non-hazardous landfill. The WNA applies a limited growth factor (see above) and then apportions the resultant volumes against identified capacity. Waste management capacity The WNA states that there are many existing sites operating within the Plan area that contribute to meeting future waste needs. It states that the	Waste management capacity. As noted in updated WNA para 164	

Ref	Individual / Organisation	Supporting document	Comment	Council response	Proposed amendment
			existing capacity has been determined from a number of sources. In order to inform capacity of the plan period, where no information on planned closure was available, planning permission end dates have been used. Capacity for sites that do not have planning permission has not been included. The NPPW confirms that, when identifying the need for waste management facilities, WPAs should consider only the extent to which the capacity of existing operational facilities would be able to satisfy the need. There are obvious reasons why this is the case. Firstly, many applicants obtain planning permission either in the hope of securing contracts subsequently, or because they simply wish to uplift the value of land without any intention to build out what they have consent for. Secondly, applicants may obtain consent for development of greater capacity than they actually intend to develop in order to safeguard against variation in waste flow or changes in market forces, and the need to have to subsequently grapple with the planning system to allow for an increase in capacity. Consented capacity and operational capacity are not the same thing. For instance, the consented (planning) capacity of the Mechanical Biological Treatment (MBT) facility at Waterbeach Waste Management Park (WWMP) is 250,000tpa, however the practical operational capacity is c.200,000tpa. The reality is that the consented capacity of any waste facility is rarely fully achieved, in part because of the installed practical capacity of the plant, and in part because of the nature and compatibility of the waste received to any facility. It is in part this reason that the NPPF and NPPG seek to ensure that LPAs provide ample flexibility in plan making. Plans should always provide for more than they statistically may be shown to need because development does not come forward at every site, and those sites that do are rarely developed to the maximum level assumed at planning stage. To fail to allow for this inevitability risks a strategy that is inflexible to changing circumstances and would result in waste having to be disposed to landfill that could be managed further up the waste hierarchy. From the list of waste management site with extant planning permission listed in Appendix 1 of the WNA, only a small handful (Waterbeach MBT; Energy 10 – 50,000 tonne pyrolysis plant for mixed waste wood and contaminated RDF; and Peterborough ERF – 85,000 tonne ERF) have the ability to treat limited amounts of municipal and C&I waste. Of the other treatment facilities identified within Appendix 1; Wisbeach Road has consent for an anaerobic digestion facility; Alconbury Airfield has consent for a biofuel facility that can accept coffee grounds; Buckden Treatment Plant is a leachate facility; Saxon Brickworks has permission for a shredding and sorting facility to create Refused Derived Fuel (RDF) for export; Addenbrooke's is a an Energy Innovation Centre for hospital clinical waste; and Woodhatch Farm is an aggregate and waste	the existing capacity was determined by collating information from several existing sources including council planning application and permission records, operator returns and reports, EA WDI dataset, other EA datasets officer estimates where necessary. The WNA has been updated to take account of the EA WDI 2017 and Defra 2018 waste statistic - this update also included identifying the existing waste management capacity based on throughput reported through the EA WDI (and other information where necessary) - refer updated WNA para 164. This approach is considered to provide a more realistic view of the existing capacity. The existing capacity only captures sites with extant planning permission. Refer to Rep.1 with regards to comments addressing residual waste arisings. Note that the EA WDI captures exports both within and outside the UK (e.g. to Europe). Exports are captured in the waste arisings estimates.	

Ref	Individual / Organisation	Supporting document	Comment	Council response	Proposed amendment
			wood processing plant. All of them result in a significant percentage of the waste input needing to be further managed either by landfill, or recovery. For example, the Waterbeach MBT operates by removing elements of recyclable waste and reducing the waste mass, principally through the removal of water. This fact is acknowledged at paragraph 64 of the WNA in that is states the processing of waste through MBT reduces the amount sent to landfill (predominantly through moisture loss) and current rates suggest around 30% loss. The critical matter that is not recognised in the WNA is that the vast majority of output from an MBT could go to recovery further up the waste hierarchy rather than being deposited to landfill as is currently the case. Of the 111,500 tonnes accepted in 2016; 2,500 was exported as leachate and metal recyclate, and 73,300 tonnes was sent to landfill. The MRF accepted 99,600 tonnes, of which 12,400 ended up being sent to landfill. Again, the vast majority of that sent to landfill from the MRF could be managed at an appropriately located thermal treatment facility. The WNA capacity calculations appear not only to have assumed that all consented development could be operational to the limit of their consents, but also that all of the waste apportioned to a treatment / recovery facility is fully dealt with and there are no resultant outputs which require further management. The future needs (or capacity gap) identified within the WNA has therefore been calculated by determining the difference between the existing capacity identified within all of the existing waste management facilities (irrespective of the actual limitations of ever operating a facility to its consented capacity) and the management capacity resulting from forecasts (irrespective of whether the forecasts fail to account for any import of waste to Cambridgeshire and Peterborough; underplay waste growth; or seek to maximise the management of waste further up the waste hierarchy). This process results in a need conclusion that, overall the Plan area is quite well placed in terms of moving towards net self-sufficiency, but acknowledging that there may be a need for additional recovery treatment capacity at the mid-point of the plan period (2026), increasing to the end of the plan period to 127,000 tonnes per annum. We would contend that this is extremely over optimistic and potentially extremely dangerous. The WNA has sought to identify the extent of need based on meeting a range of diversion targets set out in national and local strategy documents. Whilst these may represent realistically achievable levels of landfill diversion (between 10-15% of waste to landfill by 2036), the reality is that it still results in a significant amount of waste sent to landfill which could otherwise be diverted further up the hierarchy. The Green Investment Bank published a report; “The UK Residual Waste Market Report 2014”. It states that, if the market is to operate efficiently in both environmental and economic terms, up to 5% of		

Ref	Individual / Organisation	Supporting document	Comment	Council response	Proposed amendment
			suitable waste will continue to be landfilled8. This recognises practical market limitations, e.g. geographical remoteness, seasonal variations etc. but shows that achieving targets of 10-15% to landfill, whilst admirable, does not remove the need for recovery facilities if there is waste that is sent to landfill that could be managed up the waste hierarchy. This assumption applies irrespective of whether the waste stream is LACW or C&I. We would contend that the WNA can be afford to be much more optimistic in terms of volume of waste that could be diverted. National need Irrespective of the specific capacity requirements identified to meet the Cambridgeshire and Peterborough derived need, the plan should not rashly ignore the wider national need that exists. The Waste Management Plan for England (December 2013) identifies that the UK exports refuse derived fuel (RDF) to northern continental Europe for energy recovery. It states that exports have increased significantly in recent years in response to rising costs of landfill in the UK. This is supported by the Defra Digest of Waste Resource Statistics – 2017 Edition (March 2017), which is a compendium of statistics on a range of waste and resource areas based on data published by Defra, WRAP, the Environment Agency, Office of National Statistics and Eurostat. It identifies that the export of RDF from England and Wales has increased dramatically from 2010 to 2015. In 2010 9,000 tonnes was exported to energy from waste facilities elsewhere in the EU, predominantly in Germany, Netherlands, Belgium and Sweden. By 2015 this had increased to 2.82 million tonnes9. In 2016 Tolvik Consulting produced a report on the UK REDF Export Market10. It states that the UK RDF export market has expanded rapidly since 2010, with the total tonnage exported from the UK in 2015 estimated to have been around 3.1 million tonnes. In the 6 months to June 2016, data relating to RDF exports for England alone suggest that the total RDF export figure for 2016 could be 3.5 million tonnes. The report looked at the likely implications of the Brexit vote, and concluded that a weaker sterling post Brexit will impact on UK fuel prices and so upward pressure on RDF disposal routes is expected, and will make cost effective export to Europe that more unlikely, placing greater demand on the need for UK facilities to fill that gap. The evidence to date appears to support this prognosis. It is very important to not underestimate the need to ensure that there are sufficient facilities in place to drive waste management up the waste hierarchy, irrespective of any assumptions made on historical waste arising or future waste growth. It remains the case that Government Policy in the form of the Waste Management Plan for England continues to support energy from waste through a range of technologies and believes there is potential for the sector to grow significantly to reduce waste to landfill. In combination with this fact, in the eyes of the law RDF is still a waste irrespective of the fact		

Ref	Individual / Organisation	Supporting document	Comment	Council response	Proposed amendment
			that it may be (in part) a renewable fuel. As a result it must be burned in a facility which meets the specifications for an Energy from Waste facility laid down in the Industrial Emissions Directive11. The fact is that the UK does not have sufficient incineration capacity to process all the RDF produced and without the export route to the continent, much of this residual waste would go to landfill. The export of RDF to continental Europe is different from other exports in that waste companies have to pay the European Energy form Waste facilities to take the RDF. The continental waste companies meanwhile keep their gate fees below the level of the UK landfill tax to ensure an ongoing flow of waste. By exporting RDF we are depriving ourselves of a valuable renewable fuel which could help us to meet carbon reduction targets in the UK. An argument that is regularly levied at policy makers and the waste industry generally is that any risk of oversupply of EfW would discourage materials recycling (in order to 'feed the beast'). The reality is that investment in energy recovery goes hand in hand with increased recycling rates since only the residual waste is burned. Germany, for example, outperforms the UK in both recycling and energy recovery. Summary of Need Review As set out above, we contend that the figures in the WNA used to identify the capacity gap are, at best misleading, and at worst wrong. It risks moving forward with a strategy reliant upon "sticking your head in the sand" and formulating policy that is at odds with National Planning Policy. The volumes of waste arisings have been underestimated, whilst the existing capacity assumptions have been overestimated. As such, we contend that the conclusion that there is currently no need for additional recovery capacity until the mid-point of the plan, and only then at the level identified, is extremely dangerous. Importantly, it risks a strategy which conflicts with the Waste Management Plan for England and the National Planning Policy for Waste. The WNA has assumed that the need for treatment and recycling/composting facilities to meet the targets identified could be met by existing as yet unreleased latent consented capacity within extant permissions in the Plan area.	The WNA is compliant with the NPPW. Note that targets assist in guiding development and driving waste up the hierarchy. There is no block to increased other recovery and further reduction in disposal/landfill. However it is not the intention of the plan to create a regional, or wider, waste management hub. As such, and as per the NPPW and EoE WTAB MoU, the plan is based on delivering net self-sufficiency. Capacity above the WPAs needs will need to be justified in line with	

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			We contend the WNA: 1. Is at best, unclear as to the statistical basis on which future waste growth has been determined, and at worst under-estimates future likely arisings; 2. Fails to allow for or apportion any waste management provision for waste from beyond the Plan area; 3. Fails to recognise the need to manage the output waste from pre-treatment facilities; 4. Over-estimates the existing capacity that could meet identified waste arisings; 5. Under-estimates the volumes of waste that could be managed through recovery rather than to landfill; 6. Fails to provide sufficient flexibility insofar as not all consented capacity will ever be able to be developed out; 7. In proceeding with a strategy of complete self-sufficiency, it fails to include the 500,000 tonnes of waste exported from the Plan area in determining any future capacity gap; 8. Fails to apply a range of growth scenarios in accordance with the NPPG. Critically the NPPF states that Local Plans are the key to delivering sustainable development that reflects the vision and aspiration of local communities. Planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise12. An objective of the Draft Plan is to increase the amount of Cambridgeshire and Peterborough's waste being re-used, recycled and recovered; promote the movement of waste up the Waste Hierarchy by enabling the waste industry to provide facilities that help to deliver a major reduction in the amount of waste being disposed of the landfill. Furthermore, to use waste as a resource to provide opportunities for the generation of renewable energy for use within the Plan area. It is our view that the conclusions of the WNA is based on overly optimistic assumptions in terms of waste growth, optimistic assumptions in terms of existing capacity and pessimistic assumptions in terms of waste that could be managed at EfW facilities rather than to landfill. Clearly, if a capacity gap does exist then this should be met by management techniques up the hierarchy (i.e. recovery rather than landfill). If the conclusions arrived at within the WNA report are taken forward, and sufficient provision is not made in the plan for additional recovery capacity, it would undermine the Government and the Councils primary waste objectives of driving waste management up the waste hierarchy.	the plans policies. 1-8. Refer to comments above (Rep.4). The WNA has been updated to take account of the EA WDI 2017 and Defra 2018 waste statistics	
5	Hemingford Abbots Parish Council (Mrs Bridget Flanagan - 1166994)	WNA	Waste Needs Assessment May 2018 figures show that there is currently sufficient waste management capacity in the Plan Area to handle forecasted and anticipated requirements in waste recycling over the 20 year period 2016-2036. The Area has a positive capacity gap as detailed in paras 158 – 168. Thus the Waste Needs Assessment May 2018 information would appear to contradict the need in B Appendix - Call for Waste Management Sites to request the proposals for new sites: The Plan aims to identify a network of suitable waste management facilities to meet	The emerging plan document "Preliminary Draft Plan" formed the first stage of the plan-making process, as such the approach to be taken to waste development, i.e. the spatial strategy and identification of appropriate locations via either site-specific	NA

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			net waste arisings in the Plan area up to 2036 and beyond. At the time of writing, the councils are in the process of producing an up to date Waste Needs Assessment (WNA). This will be published alongside this Preliminary Plan for consultation.	allocations and/or designated areas, had not been determined. These elements are required under national policy and regulations. As such a call for sites is a standard plan making process undertaken to gauge industry interest, and to inform the Plan should it be necessary to allocate sites.	
6	The Hemingfords Action Group (1169213)	WNA	Need for additional waste transfer facilities. The Waste Needs Assessment from May 2018 states at para 108 that the Plan area of Cambridgeshire and Peterborough are 'net importers of waste, with significantly more waste imported than exported." The Assessment concludes that "currently there is sufficient waste management capacity within Cambridgeshire and Peterborough (jointly) with respect of the preparation of wastes for reuse and recycling, composting, soil treatment and disposal of non-hazardous waste to landfill" (piii and para 165). At para 155 it states that the Plan area is 'well placed in terms of moving towards net self-sufficiency'. As it stands therefore there is no immediate need to allocate a site as a new waste transfer facility. Although at para 156 the Assessment concludes, "There is a potential need for hazardous waste recycling. However, as previously acknowledged, such waste tends to be managed at a regional to national scale due to commercial contracts and economies of scale associated with waste treatment and transportation costs and they are generated in significantly lower quantities. As such it is not possible for every WPA to achieve self-sufficiency with respect to hazardous wastes." The proposal by MGL allocated 40 000 tonnes per annum of hazardous wastes. This seems grossly exaggerated and unlikely to be needed given the views in the Assessment that hazardous waste volumes are decreasing and there is less need to achieve self-sufficiency in relation to that type of waste. There is no evidence in the Assessment that there will be increased need such a to justify allocation of a new waste transfer facility in the Plan area, particularly one of the proposed size and throughput. Even if the proposal came forward with a reduced footprint and throughput however, the points below demonstrate how this site in particular is inappropriate for such an allocation. We note also that para 2.48 of the consultation document suggests that as future need within the whole Plan area is: ' . . . comparatively low and not immediate it may be prudent to take a more flexible approach for emerging technologies to come forward and for changes in industry options/market	Need for additional waste transfer facilities. Please note that waste transfer stations are considered intermediate facilities and do not add to the waste management capacity within the plan area, the exception being where the site includes capacity for preparing for reuse and recycling. As such the waste needs assessment does not include consideration of the need for additional waste transfer sites. Para 156. All sites put forward will be assessed as per the site assessment methodology. Comments received will be given due consideration through the plan-making process with any new evidence raised regarding site specific features, parameters, or circumstance taken into consideration through the site assessment process as necessary. Para 2.48. Noted.	NA

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			drivers. This may mean identifying broad areas of focus or industrial area and other suitable locations (rather than specific sites) in order to allow for a wider scope of options over the plan period.' Our clients fully support this approach as it is likely to avoid overly generous allocation and encourage more innovative and environmentally friendly methods of dealing with waste.		
7	Mr Joseph Convey (1166941)	WNA	Objection to the proposed minerals and waste plan for development by Mick George, at Hemingford Abbots. 1. We live very close to the site and will be directly affected by the plume of dust and odours arising from the site, as we our property lies in line with the prevailing wind direction. 2. We object to a greenfield site near historic villages with numerous listed buildings (ours is Grade II listed) being developed, as it demonstrates no sensitivity to the history or land use in the area. 3. Given there is existing capacity in the immediate area at Ellington and St Ives, we do not understand why extra capacity is needed, especially given the environmental impact. 4. Despite assurances from Mick George at public meetings, we have no doubt there will be a massive impact on small, underdeveloped roads in the area, especially the access road. The site is some distance from the new A14 trunk, so we are concerned 400 HCV movements that are predicted (per day) will have a very negative impact on our village and surrounding areas. 5. We are also very concerned about noise levels from the industrial machinery used for grinding mineral materials. Given the prevailing wind direction, it is certain we will be plagued by noise, for all we know, 24/7 every day. 6. Although the site is being planned as mineral waste only, we do not believe that will be the longer term position; it is likely that green waste and general organic waste will also being added, making the chance of excessive smell and infestation by insects much higher in the area. 7. Impact on the local tourism economy is certain to happen, once the word gets around that the once unspoilt Hemingfords are now sat right next to a massive council dump, with all the attendant noise, smell and insects.	All sites put forward will be assessed as per the site assessment methodology. Comments received will be given due consideration through the plan-making process with any new evidence raised regarding site specific features, parameters, or circumstance taken into consideration through the site assessment process as necessary.	NA

Site Assessment Methodology

Ref	Individual / Organisation	Supporting document	Comment	Council response	Proposed amendment
8	AmeyCespa (East) Limited (Amey) (- 1169574)	Site Assessment Methodology Report	Para 13-19 describes the process to be followed in respect of Level 1: Initial Screening. Reference is made to land-use constraints, specifically that the purpose of identifying national and international designations onsite/directly adjacent to sites at this early stage, is not to assess the potential impacts on the identified asset, but simply to act as a flag to ensure due consideration is paid to potential adverse impacts. Assessment of the impact on assets and setting would be more appropriate at Level 2. We support this approach, but question how the first 'sieve' Level 1 assessment would in reality work and help to reduce the number of sites / areas to be considered at Level 2. The only exclusive criteria (criteria which would remove sites at Level 1) appears to be in respect of key policy considerations. This is where site not in general conformity with the emerging Local Plan vision, objectives and spatial strategy. The headline objectives set out in the emerging Local Plan are broad and the criteria to help determine whether the objective is met requires precisely the type of assessment which the Site Assessment Methodology suggests would only be taken at Level 2. Whilst the concept of having an exclusive/inclusive 'sieve' process to identify appropriate sites is sound, we would suggest that the Council considers how in practice this would work given the initial screening Level 1 criteria suggested. We are concerned that as currently drafted the site selection methodology is not clear and transparent. We note at Para 18 a suggestion that assessments would be recorded using a template (i.e. green = fully compliant; yellow = generally in compliance / constraints identified; red = not compliant). We suggest that generally this is useful as a guide but care needs to be taken that sites are not unnecessarily excluded based solely on a very initial high-level screening, or conversely taken through the Level 2 based on misinformation. It appears that those sites in general compliance with Level 1 would be taken through to Level 2. We would suggest that, if in doubt, sites should be taken through to avoid the plan being overly restrictive and inflexible to change. Para 20-31 describes the process to be followed in respect of Level 2: Desktop Assessment. Only sites determined to be in general conformity with Level 1 will be subject to Level 2. The criteria used for assessment appear reasonable and comprehensive. We recognise that the intention is that no weightings would be applied to the criterion as this implies that different indicators are directly comparable, allowing for 'scores' to be allocated and added together resulting in a sum total that would determine the best option. We acknowledge this problem,	Para 13-19. The sites will be assessed on a merits basis with relevant features/issues taken into consideration. All sites submitted will also be compared against each other with the intent of identifying those that address the plans needs and are considered most appropriate to take forward. There is no need to allocate more sites than are required to address identified needs, hence the Level 1 assists in this first sort as it provides a platform on which to compare options. It should be noted that sites will not be taken forward simply to fill spaces. Only sites considered appropriate will be taken forward. Para 18. This methodology has been applied to other Minerals and Waste Local Plans and found to be a sound and robust base. Para 20-31. Noted, however a similar argument could be (and has been for other plans) applied were numerical scores to be given, with queries raised as to why (for example) a score 4 and not a 6 was	NA

			however the risk of not applying such a technique is that it is very difficult to clearly justify the options taken when progressing some sites and not others. There is a risk of the proposed approach resulting in a scenario where, for example, the risk of site generating litter (which can easily be mitigated through appropriate techniques) being given equal status in the site determination process as development located in high flood risk areas, or the compatibility of a site with surrounding land-uses. We believe that some degree of weighting has to be applied in order that decisions made by the Council in which site to be taken forward for allocation are clear and accountable. Matters that are clear national policy objectives, for example recognising the importance and relevance of co-locating waste management facilities together, should be able to be afford the weight it deserves given this is a specific expectation by government on policy makers. We question quite how the criteria will be used given that many of the criteria used are operational issues rather than issues relevant in screening one site against another? Para 32-37 describe the process to be followed in respect of Level 3: Detailed Assessment. Whilst Levels 1 and 2 appear exclusive (sites failing excluded for further consideration), Level 3 assessment would not be undertaken unless it was felt the results would address or provide further information regarding the adverse impacts identified in Level 2. It is not clear how those sites identified with constraints in Level 2 would be selected for Level 3 consideration (i.e. would it be undertaken for all sites considered in Level 2 where a constraint has been identified, or if not which would be?).	given. The risk based approach set out through the methodology deals with this matter by recognising levels of significance and scale of impact (refer Table 3 and 4). Para 32-37. As per para 32 a Level 3 assessment would only be applied in circumstances where significant constraints and/or issues are highlighted through previous levels of assessment and where such assessment is proportionate and will add value to the process. This (for example) may be where the risk impact rating is “very high” (refer Table 4) and further assessment would yield information pertinent to the assessment and proportionate to the plan-making process. An assessment will not be undertaken for the sake of being seen to do something but not actually yielding further information than currently available.	
9	Historic England	Site	We broadly welcome the approach to site assessment set out in this	Noted. The Historic	

	(Historic England - 169722)	Assessment Methodology Report	report. It is important that all assessment follows the 5 step approach set out in our advice on allocations set out above and in our advice note. It is important that all heritage assets are considered, that setting is also considered, that significance is correctly identified and that harm to be avoided in the first instance. This may require looking at alternative sites. Only where harm cannot be avoided should mitigation be sought. P5 We assume that National designations includes scheduled monuments, registered parks and gardens and listed buildings. It might be helpful to list these. It is also important to consider the setting of these assets...it is not just enough to ask does the site include or is it within or adjacent to a national designation. Questions of setting can stretch much further than being directly adjacent to. This question should therefore be amended.	Environment and Site Allocations in Local Plans, Advice Note 3 will be taken into account as noted in the methodology in a manner that is proportionate to the plan-making process. P5. Yes, the term "national designations" covers those identified. There is no need to list these as they are widely recognised and identified through regulations. In addition this term refers to other types of designations, not just heritage assets and so a broad catch-all term has been applied. Please note that Table 1 sets out those features identified during the level 1 assessment that essentially forms a first sift and flags up major issues and those that require further attention – such as setting of heritage assets.	
			P8 it might be helpful to list the type of heritage assets (ie designated including listed buildings, registered parks and gardens scheduled monuments and conservation areas, as well as no designated heritage assets). Reference should also be made to significance. Significance can be harmed through development within the setting of a heritage asset.	P8. Listing of types of assets is not required as the criterion act as a general descriptor for features to be identified and investigated through the assessment process. Reference to significance can be included.	Include reference to significance Table 2 under historic environment and heritage assets criterion objective description.
			Page 24, para 1 should that read level 2?	P24. Noted – typographical error to be corrected.	Typographical error, page 24, "Historic Environment", first para, amend "The Level 3" to "The Level 2".
			Page 24, If the Level 3 assessment shows that there is likely to be archaeology of national significance, as yet un-designated (para 139 of the MPPF), then either the site should be excluded from selection or further field evaluation would be required. This requirement should be	P24. The implications of such impacts would be assessed at this stage, at an appropriate level to the	

			included in the methodology for the Level 3 assessment. Page 24 para 6, line 2 - please insert the word 'normally' between 'would' and 'be'. Whilst it is very unlikely that detailed field assessment would be required, there may be exceptional circumstances where this is necessary in order to determine the sensitivity and deliverability of the site. In preparation of the forthcoming Plan, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups. Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. Please do not hesitate to contact us should you have any queries in the process of Plan preparation.	plan-making process. Further field evaluations may be required as part of the planning application process and this can be included in the site profile where relevant. P 24. This level of work is not considered proportionate with the plan-making process and so would be required as part of the planning application process. Noted.	

Flood Risk Assessment

Ref	Individual / Organisation	Supporting document	Comment	Council response	Proposed amendment
10	Environment Agency (Mr Chris Swain - 1169003)	Flood Risk Assessment Methodology	We note the proposal to use existing District SFRAs based on combined geographical coverage. However we advise that three out of five Cambridgeshire SFRAs are out of date in South Cambridgeshire, Fenland and Cambridge City. In any event the recent SFRAs in Huntingdonshire, East Cambridgeshire and Peterborough do not cover the minerals, waste and water infrastructure sites. This is most notably at Waterbeach Water Recycling Centre (WRC) and Milton WRC north of Cambridge where strategic water company planning has the potential be at odds with national planning policy on flood risk. Allocations will require testing alongside mapping and understanding of climate change impacts. Future flood zones on the Cam, Great Ouse Valley, fen edge and areas at tidal risk are especially susceptible to climate change impacts and present day risk. For the plan to be sound, these need assessing at a sufficiently early enough stage to apply the sequential and exception tests alongside working out viability and opportunities for the MPA to adapt to climate change. For this reason we are not yet able to provide substantive and definitive advice on proposed site allocations until the evidence base facilitates this. Paragraph 9 on page 2 states that the existing SFRAs also address the potential impacts of climate change. This statement is incorrect as some of the existing SFRAs do not include an assessment of the potential impacts of climate change using the new climate change allowances. See comments above on evidence base. Paragraph 31 states that in the absence of climate change allowance mapping, a potential change in flood zone to a higher risk zone (e.g. from Flood Zone 2 to Flood Zone 3a) will be applied to determine whether the proposed development would still be considered appropriate (i.e. whether the development would still pass the Sequential Test). Although climate change does not currently need to be considered as part of the Sequential Test process, this approach would help ensure that any site allocations are/or designations are appropriate in the future in some catchments. This should be subject to further discussion.	Although the SFRAs may be considered by the EA to be out of date it should be noted that they are only one component of a robust sequential test, that takes national and local policy into consideration, to be carried out at an early stage of the plan-making process for all proposed allocations/sites. Existing SFRAs will also be gleaned for information to support the sequential test where appropriate, but the latest national and local flood risk data will figure more prominently in the sequential testing process. Please refer to the NPPG paragraph 008, reference ID: 7-008-20140306, “Is flood risk relevant to waste and minerals plans? Waste and mineral planning authorities need to take account of flood risk when allocating land for development. They should prepare their plan policies with regard to any available Strategic Flood Risk Assessments.” All proposed allocations will be assessed as per NPPF requirements, including application of the Sequential Test (as per the	Clarify in the final version of the Flood Risk Assessment Methodology the flood risk data used to inform the sequential test. This will include relevant data and information obtained from existing Strategic Flood Risk Assessments.

				method para 18 to 28). Such assessment will be undertaken to complement the plan-making process, as set out in the method (para 12 to 17).	
				Para 9. Reference to the guidance on climate change allowances published by the EA in February 2016 will be made.	Amend to include reference to guidance on updated climate change allowances.
			Paragraph 31 also indicates that where up-to-date climate change mapping is not available, an assessment of the effects of climate change using the new allowances will be required for each of the new site allocations and/or designations as part of the site-specific flood risk assessments that will need to accompany the future planning applications. This approach would not be sound where sites are at extensive or significant risk. We also consider that a basic assessment of the effects of climate change should be undertaken for any proposed waste site allocations located within Flood Zone 3 to ensure that sufficient space would be available within the site for any required floodplain compensation and pollution prevention. Such an assessment could be undertaken by interpolating available modelled flow and level data. It should be noted within this document that the Exception Test will also need to be passed for any proposed site allocations for landfill and hazardous waste management sites located within Flood Zone 3, as these are designated as 'more vulnerable' in the NPPF. We therefore consider that a SFRA should accompany any site allocations for landfill or hazardous waste sites within Flood Zone 3 to demonstrate that these will be safe, using the new climate change allowances.	Para 31. Noted. It would be helpful if the EA could indicate what elements of this approach require further discussion or if this comment was intended to refer to future assessment of proposed allocations. Whilst sites for sand and gravel working may be allocated within Flood Zone 3, other forms of minerals and waste development are less vulnerable and so those that were at extensive or significant risk (assumed to mean Flood Zone 3b) may not pass the sequential test (note it would be helpful to more clearly define "extensive or significant risk" so that the Council could better respond to matters raised). Waste site allocations in Flood Zone 3 will be identified through the sequential test and a basic assessment of the effects of climate change for these sites will be undertaken where required.	Include proposed wording at end of para 28 "The Exception Test will also need to be passed for any proposed site allocations for landfill and hazardous waste management sites located within Flood Zone 3"

				A site specific SFRA would be required as part of the planning application process and where relevant this would be identified in the site profile as relevant. Note that this level of assessment is not considered proportionate with the plan-making process.	
			With regard to the application of the Sequential Test, the table in Appendix 2 includes the question 'Is the site reasonably available'? However, in order for the Sequential Test to be correctly applied, this table should include the question: 'Are there are any other sites at lower flood risk that are reasonably available for the proposed development?' If the answer to this question is 'yes' then the Sequential Test has not been passed.	App 2. Noted, column title to be amended accordingly.	Appendix 2, table, seventh column title to be amended as per suggested wording "Are there are any other sites at lower flood risk that are reasonably available for the proposed development?".
			It should be noted within this document that a sequential approach should be taken to the location of any new development within any sites that include areas of Flood Zone 2 and/or 3, so that new development is located within the lowest flood risk areas of the site, where possible.	This is noted in para 27 however this point can be expanded on.	Amend para 27 to read "Where the proposed development is considered appropriate (as per the NPPG) a sequential approach should be taken to the location of any new development within any sites that include areas of Flood Zone 2 and/or 3, so that new development is located within the lowest flood risk areas of the site, where possible, for example built development or static plant will be directed to areas (on site) of lowest flood risk as appropriate. Other development requirements specific to flood zones are set out in the NPPG and are taken to be applicable to all sites."

Sustainability Appraisal

Ref	Individual / Organisation	Supporting document	Comment	Council response	Proposed amendment
11	Natural England (Ms Janet Nuttall - 169717)	Sustainability Appraisal (SA) Scoping Report	We are satisfied that the Sustainability Appraisal (SA) Scoping Report (Final Report, May 2018) has been prepared in a proper, logical and comprehensive manner. We welcome the integration of the requirements of the Strategic Environmental Assessment (SEA) Directive, into the SA process. The approach to SA, as set out in the Scoping Report, including sustainability objectives, assessment methodology, consideration of relevant plans, policies and programmes and the SA framework accords with the requirements of the Planning and Compulsory Purchase Act 2004. We note and welcome that some of the comments made by Natural England at the scoping stage, in our letter dated 14 February 2018 (ref. 236546), have been incorporated within the Final Report, including reference to the Cambridgeshire Green Infrastructure Strategy (Cambridge Horizons 2011) and Natural England's Impact Risk Zones (IRZs). We trust that the objectives of the Green Infrastructure Strategy and Natural England's IRZs will be explored in detail through further development of the SA, and particularly the assessment of any site allocations.	Noted.	NA